

SHPIGEL LAW P.C.

Address 1599 East 15th street,
Fifth Floor
Brooklyn, NY 11230
Phone 212-390-1913
646-355-0242

Dated: November 17th, 2023

Hon. LaShann DeArcy Hall
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Yerkin v. Yakovlevich et. al., Docket #: 23-Civ-02399(LDH)(CLP)

Dear Judge LaShann DeArcy Hall,

The undersigned has been recently retained by the Plaintiff in the above-referenced matter. We are writing to request a pre-motion conference for leave to amend the complaint pursuant to Fed. R. Civ. Pro. 15 and for leave to conduct discovery limited to the issue of personal jurisdiction. We were only retained this Friday afternoon, and therefore will file a substantive pre-motion letter pursuant to Your Honor's Individual Rule III.A(1) & (3) in the week of November 20th, 2023.

We thank the Court for Consideration of this Request.

Respectfully Submitted,

/s/ Irina Shpigel
Irina Shpigel